

VI. RECOMENDATATIONS FOR MANAGING AGENCIES AND COMMERCIAL ENTITIES REGARDING CULTURAL RESOURCES ON DENALI HIGHWAY LANDS

Consideration of Cultural Resources in Denali Highway Projects

The State of Alaska holds cultural resources in trust for its population, just as it does its natural resources. Unlike some natural resources, cultural resources are non-renewable. Like natural resources, cultural resources must be considered when planning projects and developing budgets. Cultural resource identification and evaluation should occur early in project planning. The possible impacts to cultural resources should be assessed, allowing projects to be implemented that will minimize adverse affects on those resources.

Information on where the cultural resources are and what they consist of is important to land managers in making informed decisions on the management of resources on Denali Highway lands. The OHA has compiled a list of known cultural resources in the region, and put that information in tabular form to help manage Denali Block resources. This cultural information is incomplete, however, because of the limited archaeological survey that has been done in the region. Less than 10% of Denali Block I and 1% of Denali Block II have been surveyed for cultural resources. Early research data is often incomplete, and lacks precise location information because of the methodology and technology available at the time. Further archaeological survey is called for in the Tanana Basin Area Plan (DNR 1991:2-6). Archaeological survey should be a planned, ongoing activity, and not conducted piecemeal.

In the Denali Highway region, early assessment of impacts to the cultural resources will allow planners to implement strategies that avoid or minimize impacting those resources. It is generally more economical to avoid impacting cultural resources than to attempt to mitigate adverse effects to a cultural site. Trail or road planning or mining staging and extraction areas in the region should attempt to avoid areas with known sites or which have a high probability for undocumented sites to exist.

Roads, trails and camp sites should be situated to avoid direct and indirect impacts to cultural sites and to direct users away from sensitive areas. Existing OHV trails that traverse swampy areas and are causing users to pioneer new routes should be rerouted or hardened to limit users to the trails. Long trails without pre-established camp sites encourage users to pioneer camp locations that may be detrimental to cultural resources. State constructed camp sites must be appropriately located to avoid impacting cultural resources and not place users so close that they either purposefully or inadvertently do so.

The Process for Instituting Ground-Disturbing Activities on Denali Highway Lands

Any ground-disturbing activity on Denali Highway lands has the potential to affect the cultural resources of the region.

All parties would benefit from an annual meeting held before the field season to discuss activities in the Denali Highway region. OHA could be informed of projected activities in the region, and could advise DMLW and commercial entities on ways of avoiding or minimizing adverse effects to cultural resources.

Consultation between the land managing agency and State Historic Preservation Office (SHPO) should involve the applicant at each step of the process, to avoid

unnecessary delays due to communication gaps. Following are steps that should be followed:

Identify and Evaluate Cultural Resources

Before any ground-disturbing activity takes place on Denali Highway lands the State or Federal agency permitting the project should contact the Alaska State Historic Preservation Office (SHPO) office at OHA to consult on the potential for impacting cultural resources in the project area. At a minimum a letter should be sent to OHA describing the project, and include documentation giving its location on United States Geological Survey (USGS) 1/63,360 topographic maps. Large or complex projects may also require a meeting with OHA personnel.

The Alaska Historic Resources Survey (AHRS) database should be checked, to identify any reported cultural properties in the project area. The AHRS is a statewide database containing records of historic or prehistoric sites with locations recorded on USGS maps.

SHPO recommendations for archaeological surveys are based on the following factors: (1) the degree and type of ground disturbance the project will produce; (2) the potential for prehistoric or historic resources to be present; and (3) the occurrence and quality of previous archaeological investigations in the area.

Certain types of geophysical testing, such as the use of remote sensing or the taking of very small surface soil samples, involve only limited ground disturbance. These activities have a low potential for impacting cultural resources, and the SHPO will not request a survey in these cases. Small core diameter drilling operations may not require a survey, unless they are in an area with known cultural resources or with the high probability for cultural resources like the TLAD.

Areas in the Denali Highway region that contain a high potential for cultural resources include: overlook locations; areas near past or present lakes, lake outlets and streams; lithic procurement sites; mountain passes; areas with past or present ice patches; or areas of bunched resources (see p. 15-16). If an area has a high potential for cultural resources, the SHPO reviews previous archaeological investigations in the area. If not enough or inadequate information is available on the cultural resources of the region, the SHPO may recommend that an archaeological survey be done of the area impacted by the project. Regional cultural resources information may be considered inadequate if there has been no previous survey, if the information is old, or if locational information is inaccurate due to old technology. Very little of the State of Alaska has been archaeologically surveyed. Surveys conducted before GPS instruments became commonly available may have inaccurate locational data. Archaeological survey reports written before photocopy machines became economical to use often have poor or no maps at all.

Personnel selected to conduct the survey must meet qualifications that conform to the Secretary of Interior's Professional Qualifications Standards for archaeologists (36 CFR 61).

Agency personnel are to submit to the SHPO determinations on the significance of reported cultural resources evaluated in the project area. The significance of the cultural resources is based on eligibility for inclusion in the National Register of Historic Places. To be eligible for the National Register the cultural resource must be (A)

associated with a historic event, (B) associated with an historic person, (C) embody distinctive characteristics of construction design, method, or period, or (D) have yielded, or may be likely to yield, information important in prehistory or history.

Assess Potential Impacts of Undertaking

If there are significant cultural resources in the project area, then agency and SHPO personnel determine if the project will affect those cultural resources. The agency and applicant are to consult with the SHPO on the possibility of adjusting the project to avoid or minimize adverse effects on cultural resources.

Mitigating Adverse Effects

If it is not practicable to avoid adverse impacts to cultural resources, then mitigation will be required. Mitigation may include data recovery through archaeological excavation and/or education of the public through the development of interpretive signs, brochures, or presentations to local audiences. A memorandum of agreement may need to be developed.

Federal Permitting of Projects: The Section 106 Process

Any activities that require permitting by a Federal agency, such as the Environmental Protection Agency or Corps of Engineers, or is federally funded, must comply with the National Historic Preservation Act (NHPA). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on cultural resources, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The Section 106 process mandates federal agencies to consult with the SHPO on cultural resources within the Area of Potential Effect (APE) of a proposed undertaking. The historic preservation review process mandated by Section 106 is outlined in regulations “Protection of Historic Properties”, and codified at 36 C.F.R. 800.

For an outline of the process agencies should follow in dealing with cultural resources, and for OHA/SHPO contact address and telephone numbers, see Appendix: “Cultural Resource Management Checklist”.